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May 21, 2019

Hon. Paul A. Engelmayer
Judge U.S. Dist.Court
Southern District of N.Y.
40 Foley Square- Rm 2201
New York, N.Y. 10007

Re.: Cancino et al v. Janbar, Inc. et al
Docket No. 18-CV-7219 (PAE)
Via ECF

Hon. Engelmayer :

I represent the Defendants in this case and advise the Court pursuant to Fed.R.Civ. P. Sec. 75(d) that I must withdraw from further representing them in this case due to failure to communicate effectively with defendants and failure to reach a cooperating working relationship as well as a failure to pay my owed fees of approximately \$ 8,500 as of this date, which are over 60 past due.

There has not been any discovery produced by either party other than defendants producing the list of employees with all required information to plaintiffs as of this date for the past 3 years of employment. Discovery production had been extended per prior agreement of counsels for the parties.

Presently the collective class action motion briefing schedule previously issued by the Court is on place with plaintiff's motion brief due on May 24, 2019.

Under these circumstances, I firmly believe that it is in the best interest of all parties that my withdrawal of counsel for the defendants be effected as quickly possible with a stay of the proceedings for at least 30 days to provide defendants the hiring of successor attorneys.

Should this Court find it necessary that a letter motion not be sufficient, the Court's directive will be greatly appreciated .

Sincerely,

Philip Orner- FO-3986



Cc; Fitappelli & Shaeffer LLP- via email and ECF
Janbar Inc and John Bartnicki- via email